UNITED	STATES	DISTRIC	T COUR	T
SOUTHE	ERN DIST	RICT OF	NEW Y	ORK

IN RE TREMONT SECURITIES LAW, STATE LAW AND INSURANCE LITIGATION Master File No. 08 Civ. 11117 (TPG)

ECF Case

NOTICE BY RONALD WARD, DIANNE WARD AND RCW GROUP, INC.'S MOTION FOR PRODUCTION AND DISCLOSURE OF SETTLEMENT AGREEMENTS

PLEASE TAKE NOTICE that upon this Notice of Motion and the accompanying Memorandum of Law in Support of Ronald Ward, Dianne Ward and RCW Group, Inc.'s Motion for Production and Disclosure of Settlement Agreements, the May 28, 2015 Hearing before this Court, and all the prior pleadings and proceedings herein, Ronald Ward, Dianne Ward and RCW Group, Inc. will move before the Honorable Thomas P. Griesa, at the United States Courthouse, 500 Pearl Street, Courtroom 26B, New York, New York 10007, at a date and time to be determined by the Court, for an Order directing production and disclosure of certain settlement

agreements relating to the assessment of "fairness, adequacy and reasonableness" of the settlement at issue in this action.

Dated: June 4, 2015

Respectfully Submitted,

THOMAS, ALEXANDER & FORRESTER LLP

/s/ Emily Alexander

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